

1 Mark P. Robinson, Jr. (SBN: 054426)

mrobinson@rcrlaw.net

2 Daniel S. Robinson (SBN: 244245)

[drobinson@rcrlaw.net](mailto:drobenson@rcrlaw.net)

3 Karen L. Karavatos (SBN: 131718)

ldmravatos@rcrlaw.net

4 Shannon Lukei (SBN: 202868)

slukei@rcrlaw.net

5 ROBINSON CALCAGNIE ROBINSON SHAPIRO DAVIS, INC.

19 Corporate Plaza Drive

6 Newport Beach, California 92660

Telephone: 949-720-1288

7 Facsimile: 949-720-1292

8 and

9 Michael K. Johnson (MN #258696) (Admitted *Pro Hac Vice*)

Timothy J. Becker (MN #256663) (*Pro Hac Vice* Pending)

10 Rolf T. Fiebiger (MN #391138) (*Pro Hac Vice* Pending)

JOHNSON BECKER, PLLC

11 33 South Sixth Street

Suite 4530

12 Minneapolis, Minnesota 55402

(612) 436-1800

13 mjohnson@johnsonbecker.com

tbecker@johnsonbecker.com

14 rfiebiger@johnsonbecker.com

15 Attorneys for Plaintiff Miriam Cruz

16 Alicia J. Donahue (SBN: 117412)

adonahue@shb.com

17 SHOOK, HARDY & BACON L.L.P.

One Montgomery, Suite 2700

18 San Francisco, California 94104-4505

Telephone: 415-544-1900

19 Facsimile: 415-391-0281

20 Attorneys for Defendant

21 Bayer Healthcare Pharmaceuticals, Inc.

22

23

24

25

26

27

28

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MIRIAM CRUZ,

Plaintiff,

v.

BAYER HEALTHCARE
PHARMACEUTICALS, INC.,

Defendant.

Case No. 3:13-cv-00543-MMC

**STIPULATION AND ~~PROPOSED~~ ORDER
EXTENDING BRIEFING SCHEDULE ON
BAYER HEALTHCARE
PHARMACEUTICALS, INC.'S MOTION TO
DISMISS AND MOTION TO STRIKE**

Date: April 19, 2013

Time: 9:00 a.m.

Ctrm: 7

Complaint filed: February 7, 2013

IT IS HEREBY STIPULATED by and between, Plaintiff Miriam Cruz ("Plaintiff"), and Defendant Bayer Healthcare Pharmaceuticals, Inc. ("Bayer"), by and through their attorneys of record, that Plaintiff will take her pending Motion to Stay and all applicable briefing schedules related to that off calendar and that the briefing schedule on Bayer's Motion to Dismiss and Motion to Strike be extended as follows:

1. Good cause exists for extending the briefing schedule on Bayer's Motion to Dismiss and Motion to Strike. This case is potentially related to Multidistrict Litigation ("MDL") Docket No. 2434, *In re: Mirena IUD Products Liability Litigation*. The JPML is scheduled to hear a motion to transfer these cases on March 21, 2013.
2. Plaintiff's deadline to file an opposition to Bayer's Motion to Dismiss and Motion to Strike is currently March 19, 2013. Bayer's deadline to file a reply is currently March 26, 2013.
3. The parties respectfully request that the Court extend Plaintiff's deadline to file an opposition to Bayer's Motion to Strike and Motion to Dismiss to April 5, 2013.

1 4. The parties respectfully request that the Court extend Bayer's deadline to file a reply to
2 its Motion to Strike and Motion to Dismiss to April 12, 2013.

3
4
5
6 Dated: March 18, 2013

By: /s/ Michael K. Johnson
MICHAEL K. JOHNSON

7
8 MARK P. ROBINSON, JR.
DANIEL S. ROBINSON
KAREN L. KARAVATOS
9 SHANNON LUKEI

10 Attorneys for Plaintiff MIRIAM CRUZ

11
12 Dated: March 18, 2013

By: /s/ Alicia J. Donahue
ALICIA J. DONAHUE

13 Attorneys for Defendant BAYER
14 HEALTHCARE
PHARMACEUTICALS, INC.

15 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

16 IT IS FURTHER ORDERED that the hearing on defendant's motion is continued to April 26, 2013.

17 IT IS FURTHER ORDERED that plaintiff's Motion to Stay is deemed withdrawn without prejudice.

18
19
20 DATED: March 19, 2013


HONORABLE MAXINE M. CHESNEY